

EPA Comments on Portland Harbor Feasibility Study Source Tables
November 15, 2010

These comments are on the tables received from DEQ not the original tables sent to DEQ.

General: Regarding certain outfalls (e.g., WR205, WR102, WR202, WR203, WR 306, 307) the following statement is included: Status of Basin-wide Investigation? Additional Outfall and Up-the-Pipe Investigations? It is unclear what this SCE finding is referring to. Is this a basin-wide investigation that includes additional outfall investigations?
See below.

General: Regarding certain outfalls, the table includes the following question: Outfall SCM Controls being Designed, Constructed, or Monitored? Is an outfall CSM underway? The table should be updated to answer this question.

The questions referenced in these two comments co-occur on the tables, i.e., the first set of questions is in one column and the second set in another column for the same site. The “sites” are shared outfalls for which no owner has been identified. DEQ is or will be looking at these outfalls (also listed in Table 4.4-4 of the Draft RI) to determine whether additional investigations/evaluation will be needed.

General: There are a number of stormwater properties that are listed in italics. These are not being tracked in the milestone report. Although a number of them are identified as being diverted into the City of Portland CSO tunnel by 2011, others are not (e.g., PGE Substation E **For PGE Substation E and a number of other sites, the table says “Located in CSO basin that has been controlled; CSO occurrence very infrequent.” DEQ considers this status to be essentially the same as being diverted to the CSO).** EPA does not expect tracking of outfalls being diverted into the City of Portland CSO tunnel. However that basis for not tracking additional outfalls presented in italics should be pursued.

Depending on the priority of the outfall source, some outfall sources should be tracked in Milestone Report on a stormwater basin basis. **Some of the italicized sites are being tracked in the Milestone Report because non-stormwater pathways require investigation and/or stormwater evaluations were conducted prior to the diversion.**

In AOPC #26 there are a number of italicized sites for which the COI column says “None – cannot discharge to Outfall 11.” These sites have been diverted to the Westside Tunnel (CSO) and will only contribute to an overflow if the Tunnel overflows, and if that happens the discharge will occur somewhere other than AOPC #26.

AOPC 1: - Willamette Cove: Why is Willamette Cove listed here?

Willamette Cove in the Site Name Field should be changed to Evraz Oregon Steel Mill.

AOPC 5: - RK Storage: Does “such sites were generally not investigated further according to PH site discovery prioritization” mean that DEQ has determined that this medium priority site will not be investigated further?

Yes, DEQ screened this site along with others early in the source control process and determined that they were not a priority for further source control work. Unless new information is brought forth that would change the initial conclusion, DEQ does not intend to conduct additional work under the Portland Harbor source control program.

AOPC 11 – MarCom South: The table notes that for the overland transport pathway, “Interim remedial action and source (surficial sandblast grit and soil) removal conducted in 2008 (DEQ PM).” Has follow-up monitoring been performed to confirm whether the pathway is still complete?

DEQ believes that the removal action resulted in a complete removal of the grit source. DEQ and the responsible party are preparing the documentation to support a source control decision for the upland portion of the site.

AOPC 12 – Crawford Street: A comment from Integral is included in the table. What is the effect of this comment on the table conclusions? Has the table been updated to address the comment?

DEQ was not aware of the comment because it is not present in the print version of the table. The comment will not change the table conclusion, and DEQ has not made updates to address the comment.

AOPC 15 – McCormick and Baxter: The concept of a SCE does not fit the McCormick and Baxter Site. The table should be updated to reflect the current regulatory status of the McCormick and Baxter site. It should be noted that monitoring efforts are underway to support an operational and functional determination by EPA.

DEQ agrees.

AOPC 17 – U.S. Coast Guard Station: A comment from Integral is included in the table. What is the effect of this comment on the table conclusions? Has the table been updated to address the comment?

DEQ was not aware of the comment because it is not present in the print version of the table. The comment will not change the table conclusion, and DEQ has not made updates to address the comment.

AOPC 18 – Dura Industries: The table notes that additional information is needed. Who is responsible for getting this information? Where will it come from? See also AOPC 9A (Transloader).

DEQ does not have any new information for any site which still retains this language in the table.

AOPC 19 – Gunderson: The tables states the following: “VOC plume migrating to the river and with the groundwater gradient. Need to complete site-wide GW screening to update sampling program . SEE NOTE 3.” Where is NOTE 3? What is meant by site-wide GW screening? There are other notes referenced here that do not appear to be provided (e.g., NOTE 4).

The referenced site-wide GW screening relates to the upland portion of the site not addressed by the Area 1 TCA groundwater pump and treat system. The reference to Note 3 and 4 appear to be a carryover from DEQ’s Milestone Report and should be edited.

AOPC 20 – GE – NW 28th: A comment from Integral is included in the table. What is the effect of this comment on the table conclusions? Has the table been updated to address the comment?

DEQ was not aware of the comment because it is not present in the print version of the table. The comment will not change the table conclusion, and DEQ has not made updates to address the comment.